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Attorneys for Defendants
DAVITA, INC. and
DVA RENAL HEALTHCARE, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SAIRA SHEIKH, an Individual,
Plaintiff,

v.

DAVITA INC., a Delaware corporation;
DVA RENAL HEALTHCARE, INC., a
Tennessee corporation; and DOES 1 through 10,
inclusive,

Defendants.

CASE NO. 2:25-cv-00111-TLN-CSK

**STIPULATION REGARDING
DISCOVERY IN THIS ACTION;
ORDER**

Complaint Filed: December 9, 2024
Action Removed: January 10, 2025
Trial Date: Not Set

TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Federal Rule of Civil Procedure 16(b)(4) and Local Rule 143, this Stipulation is entered into by and between Plaintiff Saira Sheikh (“Plaintiff”) and Defendants DaVita, Inc. and DVA Renal Healthcare, Inc. (“Defendants”) (collectively, the “Parties”), through their respective counsel of record, as follows:

WHEREAS, on December 9, 2024, Plaintiff filed a complaint in California Superior Court for the County of Solano;

WHEREAS, on January 10, 2025, Defendants removed the case to this Federal Court;

WHEREAS, on January 21, 2025, Plaintiff filed a motion to remand the case back to California Superior Court;

WHEREAS, on January 29, 2025, the Court issued a scheduling order that called the Parties to complete discovery by January 9, 2026; and

WHEREAS, the Parties initially found it most prudent to wait to initiate discovery until the Court issued its ruling on Plaintiff’s pending motion to remand to determine whether this Court had subject matter jurisdiction over the dispute but recently agreed it made more sense to proceed with discovery subject to an agreement that safeguards against the risk of unnecessary expenses associated with the Court potentially granting the motion and remanding the case back to California Superior Court.

NOW, THEREFORE, IT IS HEREBY STIPULATED that the Parties agree that any discovery procured in Federal Court cannot and need not be re-sought in California Superior Court in the event the Court issues an order granting Plaintiff’s Motion to Remand.

[signatures on next page]

1 Respectfully submitted,

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3 Dated: June 18, 2025

WEST COAST EMPLOYMENT LAWYERS, APLC

4
5 By: /s/ Ronald L. Zambrano

6 NEAMA RAHMAN
7 RONALD L. ZAMBRANO
8 ASHLEY J. GARAY
9 Attorneys for Plaintiff
10 SAIRA SHEIKH

11 Dated: June 18, 2025


MCDERMOTT WILL & EMERY LLP

12 By: /s/ Pankit Doshi

13 PANKIT DOSHI
14 CHRIS BRAHAM
15 M. ALEJANDRA CHUMBES
16 Attorneys for Defendants
17 DAVITA, INC. and
18 DVA RENAL HEALTHCARE, INC.

19
20 **IT IS SO ORDERED.**

21 Dated: June 20, 2025

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23 _____
24 Troy L. Nunley
25 Chief United States District Judge
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